

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|---|---|-----------------------------|
| DAVID KRAMER, |) | |
| |) | |
| Plaintiff, |) | |
| |) | No. 08 C 2530 |
| v. |) | |
| |) | Judge Ruben Castillo |
| SHERIFF'S DEPUTY STEVEN STELTER, |) | |
| et al., |) | |
| |) | |
| Defendants. |) | |

**DEFENDANT'S MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant JOHN P. CREEDON, by his attorney, LISA MADIGAN, Illinois Attorney General, moves this Court to grant him until August 15, 2008 to answer or otherwise plead to Plaintiff's complaint. In support thereof, Defendant states as follows:

1. Plaintiff filed his 108-page complaint on May 2, 2008 seeking damages for alleged injuries related to activities involving Plaintiff's used car business in late summer and early fall of 2005 .
2. Defendants received service of a summons and the complaint in this matter on July 12, 2008.
3. Based on the service date of the summons, Defendant's answer or motion to dismiss would have been due on August 1, 2008.
4. This case was not assigned for representation to the undersigned Assistant Attorneys General until July 31, 2008. Therefore, counsel for Defendant respectfully request an additional twenty-nine (29) days, to and including August

29, 2008 to further investigate and research this matter.

5. This motion is not made for purposes of delay and this brief extension will not prejudice Plaintiff.

WHEREFORE, Defendant respectfully requests this Honorable Court grant him until August 29, 2008 to answer or otherwise plead to Plaintiff's complaint.

Respectfully submitted,

LISA MADIGAN
Illinois Attorney General

/s/ Alice E. Keane
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